

REMARKS

Administrative Overview

Initially, claims 1–17 were presented for examination. Claims 1, 6, 9, and 11 have been amended, and claims 5 and 17 have been cancelled without prejudice. Upon entry of this paper, claims 1–4 and 6–16 will be pending in this application.

In the Office action mailed on June 15, 2004, claims 1, 3–4, 9, 10, and 15–16 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,224,423 to Borel, and claims 1 and 5 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 2,219,085 to Watson. Further, claims 2 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Borel, and claims 5 and 17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Borel in view of U.S. Patent No. 4,025,751 to Wright. Claims 6–8 and 11–13 were objected to as being dependent upon a rejected base claim, but were deemed allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

In light of the foregoing amendments, Applicants respectfully traverse the rejection of claims 1–4, 9, 10, and 14–16 and the objection to claims 6–8 and 11–13 and request reconsideration of these claims. Support for the amendments to the claims may be found, at least, for example, in the specification at page 6, line 6 to page 7 line 2, page 8, lines 19–22, and in Figures 1A and 1B.

Specification and Drawings

Applicants amend the specification and drawings as indicated above to correct typographical errors. Applicants submit that the foregoing amendments are corrections of obvious errors, and that both the errors and the appropriate corrections would be recognizable to a person skilled in the art. Applicants submit that no new matter is introduced by any of the foregoing amendments. Accordingly, Applicants respectfully request entry of these Amendments to the specification and drawings.

Rejections of Claims under 35 U.S.C. § 102

The undersigned wishes to thank the Examiner for his time, helpful suggestions, and courtesy during the telephonic interview that took place on September 9, 2004.

Claims 1, 3–4, 9, 10, and 15–16 were rejected under 35 U.S.C. § 102(b) as being anticipated by Borel. As discussed in the interview, Applicants have amended independent claims 1 and 9 to recite that the plate is mounted externally to the cylinder when the temperature difference between the plate and the cylinder is established. Support for these amendments may be found at least at page 6, line 6 to page 7, line 2, page 8, lines 19–22, and in Figures 1A and 1B. Borel, by contrast, does not teach or suggest establishing a temperature difference with the plate mounted externally to the cylinder. Rather, Borel teaches heating the plate when the plate is already in contact with and wrapped around the cylinder, as indicated, for example, in Borel's Figure 1 (reference labels P and Pp) and at column 3, line 63 to column 4, line 3 ("...thermal lengthening due to thermal waves 4 directed by a *concentric* thermal waves emitter 40 onto the cylinder Pp." [Emphasis added.]) Therefore, in light of the foregoing claim amendments, Applicants respectfully submit that amended claims 1 and 9 and their dependents are patentable over Borel.

Claims 1 and 5 were rejected under 35 U.S.C. § 102(b) as being anticipated by Watson. As discussed above, Applicants have amended claim 1 to recite that the plate is mounted externally to the cylinder when the temperature difference between the plate and the cylinder is established. Watson does not teach or suggest establishing a temperature difference with the plate mounted externally to the cylinder. Rather, the establishment of the pre-tensioning temperature difference disclosed by Watson takes place between weld material and the cylinder *after* the mounting of the plate on the cylinder. For example, as cited in part by the Examiner on page 3 of the Office action, Watson discloses at page 2, column 2, lines 62–67:

"In the practice of my invention welds, uniting the sheets into an integral covering, are formed, *while* the said sheets are compressed about the body member. These welds exert, upon cooling, the tension

desired to draw said integral covering into intimate relation with said body member.” [Emphasis added.]

Therefore, in light of the foregoing claim amendments, Applicants respectfully submit that amended claim 1 is patentable over Watson. Applicants herein cancel claim 5 without prejudice, rendering the rejection of claim 5 moot.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 3–4, 9, 10, and 15–16 under 35 U.S.C. § 102(b).

Rejections of Claims under 35 U.S.C. § 103

Claims 2 and 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Borel. Claims 2 and 14 depend respectively from independent claims 1 and 9 which, as currently amended, recite establishing the temperature difference between the plate and the cylinder “wherein the plate is mounted externally to the cylinder.” This limitation is significant at least because the establishment of the temperature difference between the plate and the cylinder while the plate is not in contact with the cylinder helps reduce the risk of unwanted plate distortions (and resulting defective printing) caused by friction between the plate and the cylinder as the mounted plate shrinks against the cylinder (page 9, line 22 to page 10, line 1). As discussed above, Borel does not teach or even suggest establishing a temperature difference when the plate is mounted externally to the cylinder. Applicants therefore submit that, following the amendments to claims 1 and 9, Borel does not teach or suggest the subject matter of claims 2 and 14.

Accordingly, in light of the foregoing reasons and amendment to claims 1 and 9, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 2 and 14 under 35 U.S.C. § 103(a).

Claims 5 and 17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Borel in view of Wright. Applicants herein cancel claims 5 and 17 without prejudice.

Allowable Subject Matter

Claims 6–8 and 11–13 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the

limitations of the base claim and any intervening claims. Applicants thank the Examiner for the indication of allowable subject matter, and amend claims 6 and 11 by rewriting these claims in independent form, including all the limitations of respective base claims 1 and 9. Applicants note that the allowable claims share the advantage discussed in the foregoing paragraph with respect to the reduced risk of thermally-induced plate distortions, as compared to the approach disclosed in the cited art.

Accordingly, in light of the foregoing reason and amendments to claims 6 and 11, Applicants respectfully request reconsideration and withdrawal of the objections to claims 6 and 11, and their dependents, claims 7, 8, 12, and 13.

CONCLUSION

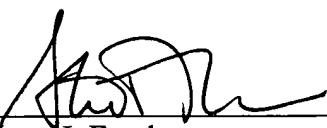
In light of the foregoing, Applicants submit that claims 1-4 and 6-16 are in condition for allowance. If the Examiner believes that a telephone conversation with Applicants' attorney would expedite the allowance of this application, the Examiner is invited to call the undersigned.

Respectfully submitted,

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Amendments to the Drawings

Applicants amend Figure 2 to correct two typographical errors in which the original label reference number 220 is replaced by label 222 and original label reference number 222 is replaced by label 220. Applicants submit herewith replacement drawing sheet 2 and a marked up drawing sheet 2 reflecting this amendment. Applicants submit that no new matter is introduced by this amendment.



Title: Plate Handling with Thermal Tensioning
Inventor(s): Theriault et al.
Serial No. 10/643,036
Atty Docket No. PTK-228
Atty: Steven J. Frank
Annotated Marked Up Drawing Sheet 2 of 2

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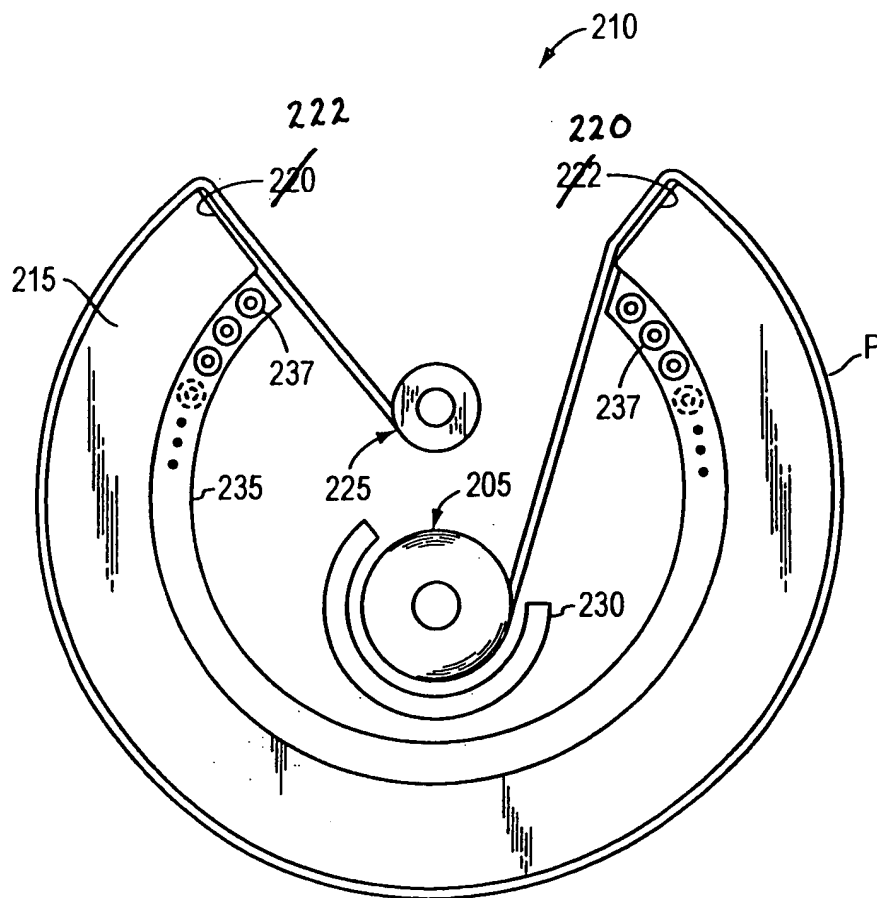


FIG. 2